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14 *Attorneys for Plaintiffs and the*
15 *the Proposed Class*

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 IN RE SEAGATE TECHNOLOGY LLC
20 LITIGATION

No. 3:16-cv-00523-JCS

21 DECLARATION OF ERIC L. INGRAM
22 FURTHER SUPPORT OF PLAINTIFFS'
RENEWED MOTION FOR CLASS
CERTIFICATION

23 DATE: Jan. 18, 2019
24 TIME: 9:30 a.m.
DEPT: Hon. Joseph C. Spero
Courtroom G, 15th Floor

1 I, ERIC L. INGRAM, declare as follows:

2 1. I am a resident of Orange Park, Florida and have personal knowledge of the matters
3 stated in this declaration. If called upon, I could and would competently testify to the facts stated
4 here.

5 2. Sometime in late 2013 or early 2014, while a resident of Florida, I purchased a 3TB
6 Seagate Barracuda from Wal-Mart for personal use. The drive failed within two years.

7 3. Prior to purchasing the drive, I relied on Seagate's representations regarding the
8 drive's annual failure rate, which was published on their website and in their product sales
9 documents. I have worked in telecom and IT for the better part of thirty years, and generally rely
10 on specifications such as Seagate's when making my purchases.

11 4. I would be willing to stand in as the class representative for consumers who
12 purchased drives in the state of Florida. I understand the duties of a class representative and am
13 generally familiar with this litigation.

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17 ERIC L. INGRAM
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